



August 24, 2012

Mr. Barry Stephens, Technical Secretary
Tennessee Department of Environment and Conservation
Division of Air Pollution Control
9th Floor, L&C Annex
401 Church Street
Nashville, TN 37243-1531

RE: imi South, LLC Concrete Batch Plants

- **Clarksville-St. Bethlehem, 63-0303-01**
- **Clarksville-Quarry, 63-0304-01**
- **Cumberland City, 81-0036-01**

Dear Mr. Stephens:

This letter is in response to the Notice of Violation dated August 7, 2012 concerning the construction permit applications submitted for the above-referenced facilities. The purpose of this letter is to provide information on mitigating circumstances with regard to the alleged violation of Division rules.

I have been working with Division staff, including Ms. Carol Williams, on updating our respective files with regard to permit numbers, contract information, and Air Emission Source numbers. During that process, we discovered that these three facilities had seemingly never been permitted, dating back to before their being acquired by imi South, LLC. Once this situation became apparent, imi took the initiative to submit permit applications for the facilities. Construction permits for these three facilities have been issued by the Division, and operating permit applications have been submitted.

Rather than waiting for an inspection or other official action to separately discover these apparent violations, imi took a proactive approach, in essence self-reporting and taking steps to correct the situation. imi South takes its responsibilities to the environment and regulatory agencies seriously, and strives to be an industry leader in environmental compliance.

I believe these to be mitigating circumstances, and hope that they be taken into due consideration when evaluating the need for further enforcement action.

Thank you for your consideration. Please contact me at (502) 456-6930 or kirk.reinke@irvmat.com if there are any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirk Reinke", is written over the word "Sincerely,".

Kirk Reinke
Environmental Manager

"We're Proud of Our Work"